

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SHAWN DRUMGOLD,	)	C.A. NO. 04-11193NG
Plaintiff	)	
	)	
v	)	
	)	
TIMOTHY CALLAHAN, ET AL.	)	
Defendant(s)	)	
	)	

**PLAINTIFF'S PROPOSED SCHEDULING ORDER**

NOW COME the Plaintiff and makes the following proposal scheduling order. This Court in its order of October 27, 2005 order the parties to file a joint proposed order.

The parties have been unable to agree on a joint order. This proposed order preserves this Court's October 27, 2005 order that there be a trial date of September 6, 2006 and adjusts the dates accordingly.

- A. Initial disclosures to be made on or before November 14, 2005;
- B. Motions to Dismiss to be filed on or before December 15, 2005;
- C. Plaintiff's expert disclosures to be made pursuant to Rule 26A(2) on or before May 15, 2006;
- D. Defendants' experts disclosures pursuant to Rule 26A(2) to be made on or before June 1, 2006;
- E. Depositions and discovery to be concluded on or before July 1, 2006;
- F. Expert depositions, if necessary, to be completed on or before July 1, 2006;
- G. Motions for Summary Judgment to be filed on or before August 1, 2006;

- H. Final pretrial conference as scheduled by to the Court;
- I. Trial September 6, 2006.
- J. 30 depositions per side, any additional depositions allowed only upon allowance of motion for leave to do so.

Respectfully submitted,  
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Shawn Drumgold

/s/ Rosemary Curran Scapicchio

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